

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA)	
)	
)	
v.)	Criminal Action No. 1:23-cr-00061-MN
)	
ROBERT HUNTER BIDEN,)	
)	
Defendant.)	
)	
)	
)	

MR. BIDEN'S PROPOSED VERDICT FORM

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Counsel for Robert Hunter Biden

Mr. Biden opposes the Special Counsel's proposed verdict form because its streamlined description of the charges makes them appear to be broad strict liability offenses, which is inaccurate and deeply prejudicial.

Dated: May 28, 2024

Respectfully submitted,

Bartholomew J. Dalton (#808)
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JURY VERDICT FORM

1. As to Count One, charging the defendant with knowingly making a false statement material to the lawfulness of the sale of a firearm, we the jury find the defendant:

_____ Not Guilty _____ Guilty

2. As to Count Two, charging the defendant with knowingly making a false statement with respect to information required to be kept in records of a federal firearms licensee, we the jury find the defendant:

_____ Not Guilty _____ Guilty

3. As to Count Three, charging the defendant with knowingly possessing a firearm while knowingly being an unlawful user of or addicted to a controlled substance, we the jury find the defendant:

_____ Not Guilty _____ Guilty

The foregoing constitutes the unanimous verdict of the jury.

PRESIDING JUROR

DATE

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2024, I filed the foregoing proposed jury verdict form to the Motion to Exclude Proposed Defense Experts with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Abbe David Lowell
Abbe David Lowell

Counsel for Robert Hunter Biden